

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WOLFRAM ARNOLD, et al.,

Plaintiffs,

v.

X CORP. f/k/a TWITTER, INC., et al.

Defendant.

C.A. No. 1:23-cv-528-JLH-CJB

**CORNET PLAINTIFFS' MOTION TO PROVISIONALLY SEAL MOTION
FOR LEAVE TO FILE AMICUS BRIEF IN OPPOSITION TO THE
MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION AND
ACCOMPANYING EXHIBITS**

Shannon Liss-Riordan (*pro hac vice*)
Bradley Manewith (*pro hac vice*)
Thomas Fowler (*pro hac vice*)
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800
Email: sliss@llraw.com
bmanewith@llrlaw.com
tfowler@llrlaw.com

Kate Butler, Bar I.D. No. 6017
Kate Butler Law LLC
1509 Gilpin Ave, Suite No. 3
Wilmington, DE 19806
Phone: (302) 966-9994
email: kate@katebutlerlaw.com

Attorneys for Plaintiffs

Pursuant to this Court’s Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Emmanuel Cornet, Justine De Caires, Lenn Kindel (f/k/a Grae Kindel), Alexis Camacho, Jessica Pan, Emily Kim, Miguel Andres Barreto, and Brett Menzies Folkins, on behalf of themselves and all other similarly situated (collectively “Cornet Plaintiffs”) hereby move to provisionally seal the following documents:

1. Cornet Plaintiffs’ Motion for Leave to File *Amicus* Brief in Opposition to the Magistrate Judge’s Report and Recommendation Under Seal (“Motion for Leave to File *Amicus* Brief”) (attached hereto as Exhibit 1). Plaintiffs will publicly file this document with redactions.
2. Cornet Plaintiffs’ Proposed *Amicus* Brief in Opposition to the Magistrate Judge’s Report and Recommendation (“Proposed *Amicus* Brief”) (attached hereto as Exhibit 2). Cornet Plaintiffs will publicly file this document (which is Exhibit A to Cornet Plaintiffs’ Motion for Leave to File *Amicus* Brief) with redactions.
3. An Arbitration Award (attached hereto as Exhibit 3) obtained by Cornet Plaintiffs’ counsel against Twitter (“Arbitration Award”), which is Exhibit 1 to the Proposed *Amicus* Brief. Cornet Plaintiffs will publicly file a slip sheet in place of this document, as it will be sealed in its entirety.

The reason for Cornet Plaintiffs' request for sealing is that Twitter takes the position that arbitration awards are confidential. The Motion for Leave to File *Amicus* Brief and Proposed *Amicus* Brief both describe the contents of the Arbitration Award.

Additionally, if the Court is disinclined to permit the redactions and sealing that Cornet Plaintiffs have sought, Cornet Plaintiffs respectfully request the opportunity to submit revised versions with limited redactions removing information that would disclose the identity of the arbitral claimant.

Dated: December 19, 2024

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, JESSICA PAN, EMILY KIM,
MIGUEL BARRETO, and BRETT
MENZIES FOLKINS, on behalf of
themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

Kate Butler, Bar I.D. No. 6017

Kate Butler Law LLC

1509 Gilpin Ave, Suite No. 3

Wilmington, DE 19806

Phone: (302) 966-9994

Email: kate@katebutlerlaw.com

Shannon Liss-Riordan (*pro hac vice*)

Bradley Manewith (*pro hac vice*)

Thomas Fowler (*pro hac vice*)

LICHTEN & LISS-RIORDAN, P.C.

729 Boylston Street, Suite 2000

Boston, MA 02116

(617) 994-5800

Email: sliss@llrlaw.com

bmanewith@llrlaw.com

tfowler@llrlaw.com

CERTIFICATE OF SERVICE

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record in this matter via filing on the Court's CM/ECF system and that Cornet Plaintiffs have served the sealed version of this document on Defendant's counsel via email on December 19, 2024.

/s/ Kate Butler
Kate Butler